

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	)	
	)	Chapter 11
	)	
The Philadelphia Orchestra Association	)	Case No. 11-13098 (ELF)
	)	
Academy of Music of Philadelphia, Inc.	)	
	)	Jointly Administered
Debtors.	)	
	)	

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

The above-captioned debtors (the “Debtors”) filed voluntary chapter 11 petitions for bankruptcy on April 16, 2011. On September 28, 2011, Debtor The Philadelphia Orchestra Association filed the following motion (the “Motion”):

- Motion of The Philadelphia Orchestra Association for Entry of an Order: (i) Authorizing It to Obtain Post-Petition Financing Pursuant to Sections 363 and 364 of Bankruptcy Code, (ii) Authorizing It to Enter into the Debtor-In-Possession Credit and Security Agreement, (iii) Authorizing Use of Cash Collateral Pursuant to Section 363 of Bankruptcy Code, and (iv) Granting Liens and Super-Priority Claims to DIP Lender Pursuant to Section 364 of Bankruptcy Code and Modifying the Automatic Stay to Implement the Terms of the DIP Order

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the above-referenced Motion or if you want the court to consider your view on the Motion, then on or before October 13, 2011, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Office of the Clerk of the Bankruptcy Court  
Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107  
Phone: (215) 408-2800

(b) mail a copy to the movant’s attorney:

Lawrence G. McMichael  
Dilworth Paxson LLP  
1500 Market Street, Suite 3500E

Philadelphia, Pa 19102  
Phone: (215) 575-7000  
Fax: (215) 575-7200

2. If you or your attorney do not take the steps described in paragraphs 1(a) and (b) above and attend the hearing, the court may enter an order granting the relief requested in the motion you are contesting.

3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on October 26, 2011 at 11:00 a.m. in Courtroom 1, United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: September 28, 2011

/s/ Lawrence G. McMichael

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